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March 9, 2015

Luciano F. Paone v. Qualcomm, Inc.
Case No. 2:15-cv-00647-BMC

Dear Judge Cogan:

I am counsel for Defendant Qualcomm, Inc. ("Qualcomm") in the above-captioned action. I write to request an extension of Qualcomm's time to respond to the complaint and to reschedule the Initial Status Conference currently set for March 27, 2015.

Qualcomm respectfully requests that the Court grant it an extension of thirty days to respond to the complaint, from March 12, 2015, until April 13, 2015 (April 11 being a Saturday). Plaintiff consents to this request. This is the second request for an extension of time by either party. The first request was denied because the Court ruled that it "generally does not grant extensions to parties who have failed to appear". We were retained by Qualcomm to represent it in this action after the issuance of this order.

In addition, Qualcomm requests that Your Honor reschedule the March 27 Initial Status Conference to a date between May 19 and 22, 2015 (or some date thereafter that is convenient for the Court), for several reasons. First, I have a previously scheduled trip out of the country for the week from March 21 through March 28. Second, the parties believe it would be helpful to have some time after Qualcomm responds to the complaint to meet and confer and otherwise prepare for the conference. Finally, this action is related to seven other actions in the Eastern District of New York involving the same plaintiff and patent. We understand that Plaintiff intends to move to have all of

these cases deemed related and heard by a single Judge once Plaintiff is able to confer with each defendant. Plaintiff consents to this request to reschedule the Initial Status Conference.

Respectfully submitted,

/s/ Keith R. Hummel
Keith R. Hummel

Honorable Brian M. Cogan
United States District Court for the
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

BY ECF

Copies to counsel of record by ECF